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RESPONSE TO OEPA COMMENTS ON THE DOE RESPONSES TO THE ORIGINAL OEPA COMMENTS ON THE OPERABLE UNIT 4 - SILO SUPERSTRUCTURE FOR THE FRVP PRELIMINARY AND PRE-FINAL DESIGN

09/13/96

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RESPONSES

RESPONSE TO OEPA COMMENTS ON THE DOE RESPONSES TO THE ORIGINAL OEPA COMMENTS ON THE OPERABLE UNIT 4 - SILO SUPERSTRUCTURE FOR THE FRVP PRELIMINARY AND PRE-FINAL DESIGN

1) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code:
Original Comment #: 1
Comment: Real-time continuous radon monitoring should be conducted during the berm grading and lowering. The use of temporary monitoring locations may be suitable. In addition insufficient reference to specific a (sic) future design submittal for additional detail is provided. The statement, "...(location to be identified under a future FRVP design scope)..." is not acceptable. DOE should reference a specific submittal and the date upon which the submittal will be delivered to the agencies for approval.

Response: Real-time continuous radon monitoring will be conducted during berm grading and lowering activities. Monitoring will temporarily be halted as necessary during fence and utility relocation, however, will be re-established prior to berm excavation. If it is necessary to relocate the monitors from their current location, the agencies will be notified of their new locations.

The path forward for remediation of Operable Unit 4 is currently undergoing re-evaluation. We will provide the requested schedule detail after this modification is completed and approved by the agencies.

Action: No action at this time.

2) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: Pg #: Line #: Code:
Original Comment #: 8
Comment: The second paragraph of the last page of comments should be revised. Determination of whether soil is acceptable for disposal in the OSDF must be consistent with the methods and criteria established for WAC determination by OU2. Reference should be made to the appropriate OU2 submittal for such methods.

Response: The general methods described for determining whether soil is acceptable for disposal in the OSDF is consistent with the current Soils Project WAC policy currently under development. This group is responsible for developing and implementing the soil WAC certification program for the OSDF. The WAC policy will be detailed in the Sitewide Excavation Plan (SEP) for submittal to the agencies in March of 1997.

Action: No action required at this time.

3) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: RtC Pg #: 4-5 Line #: n/a Code: C
Original Comment #: 11
Comment: When isokinetic sampling calls for the changeout of the HEPA filter, has DOE set limits or standards for how much pressure differential warrants a changeout? Is there a certain level above or below which action is taken? When the spare filter is activated, will the switchover be instantaneous?

Response: Design of the New Radon Treatment System (NRTS) and subsequent development of Standard Operating Procedures (SOPs) will establish filter changeout requirements. Typically at the FEMP, the requirement for changeout of HEPA filter elements is when the differential pressure reaches 4 inches of water. Being an in-line spare, the time for activation of the spare filter will be the time it takes for opening/closing the appropriate valves.

Action: No action at this time.

4) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: RtC Pg #: 8 Line #: n/a Code: C
Original Comment #: 22
Comment: Although the table and the referenced text inherently infers direct exposure, in order to be technically correct the term "direct exposure" should be added to this table. Clarification of this table is important in that tables are more likely to be used as a quick reference, and this table may misdirect the reader thinking that the table refences (sic) total exposure.

Response: Table C-1 will be revised to clarify direct exposure

Action: The document will be revised via the attached change-page.

5) Commenting Organization: Ohio EPA Commentor: OFFO
Section #: RtC Pg #: 8 Line #: n/a Code: C
Original Comment #: 23
Comment: 10 CFR 835 was referenced for personnel radon monitoring. Will individual workers be provided radon dosimetry, in addition to ambient air monitoring? Will ambient air monitoring include radon daughter measurements?

Response: Yes, workers will be provided with radon dosimetry per 10 CFR 835, in addition to conducting ambient air monitoring. Ambient air monitoring will measure radiation resulting from radon daughters.

Action: No action at this time.

Calculation 4161-56-02

Table C-1 - Direct Exposure Dose Rate Estimates for workers in ER (Centerline Above Silo Dome)

Waste Height (ft)	Headspace Height (ft)	Steel Shield Thickness (in)	Dose Rate from Waste (mrem/hr)	Dose Rate from Radon (mrem/hr)	Total Dose Rate (mrem/hr)
23	8.1	2	8.9	1.0	9.9
		1	18.2	2.9	21.1
18	13.1	2	8.6	1.7	10.3
		1	17.4	4.6	22.0
13	18.1	2	8.2	2.3	10.5
		1	16.2	6.2	22.4
8	23.1	2	7.7	2.8	10.5
		1	14.9	7.5	22.4
3	28.1	2	7.2	3.3	10.5
		1	13.6	8.8	22.4

Other direct exposure dose rate estimates

Description	Shielding Material	Thickness (in)	Dose Rate (mrem/hr)
Top dose @ 4 ft beyond silo side along manway	steel	0.25	14.4
Side contact dose from existing residue	soil	68	7.20E-06
Side contact dose with + 20 ft headspace	soil	68	6.32E-06
10 meter side dose from headspace with no soil	n/a	n/a	2.8

Notes:
1. These values are based on Silo 1 residue concentrations from the RI/FS.

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